



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MSA/SDD
F.#2011R00783

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 2, 2012

By ECF

Honorable John Gleeson
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Agron Hasbajrami,
Criminal Docket No. 11-623 (S-1) (JG)

Dear Judge Gleeson:

The above-captioned defendant has been charged with four counts of providing and attempting to provide material support to terrorists, in violation of 18 U.S.C. § 2339(A). The next status conference in the case is scheduled for March 7, 2012.

The government writes to respectfully request an adjournment of the conference until March 12, 2012, or another date thereafter that is convenient for the Court. The reason for this request is that AUSA DuCharme, who planned to appear at the conference, learned yesterday that he is required to travel abroad from March 6 until March 9 for an investigation. AUSA Amatruda will be away from the office on March 7 on personal travel, and therefore unable to cover the appearance.

In addition, the government has sought and expects to receive authorization from the Justice Department to extend a plea offer to the defendant. The government hopes to make that offer early next week. The requested adjournment will allow the defendant and counsel to discuss the offer before the next status conference.

With the consent of defense counsel, the government therefore respectfully requests an adjournment of the March 7, 2012 status conference.

Furthermore, should the Court grant the government's request, in the interests of justice and because of ongoing

discovery and plea discussions, the government moves to exclude the period between March 7, 2012 and the date of the next status conference under the Speedy Trial Act. Defense counsel does not object to such an exclusion.

Thank you for your consideration.

Respectfully submitted,

LORETTA E. LYNCH
United States Attorney

By: /s/
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cc: Steven Zissou, Esq.